

Barry N. Saltzman
Vincent F. Pitta

IRINA MORDUKHAYEV,

– against –

HILTON TIMES SQUARE, SUNSTONE HOTEL PROPERTIES INVESTORS, INC., HILTON HOTELS CORPORATION, FC42 HOTEL LLC, SUNSTONE 42ND STREET LLC, SUNSTONE 42ND STREET LESSEE, INC., SUNSTONE HOTEL PROPERTIES, INC. D/B/A HILTON TIMES SQUARE, SUNSTONE HOTEL OP, SECURE WATCH24 D/B/A SW24, SLAVKA KMEE, FOSTER BURNETT, ROCCO CASTELLANO, AND NEW YORK HOTEL AND MOTEL TRADES COUNCIL, AFL-CIO (Union),

Defendants.

STATE OF NEW YORK)
COUNTY OF NEW YORK) S.S.:

That deponent is not a party to the action is over eighteen years of age and resides in Brooklyn, New York.

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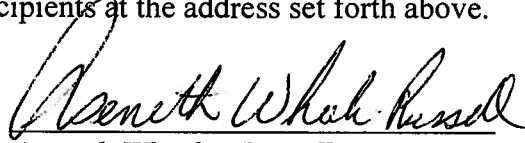
**FRCP 12(c), Union's Memorandum of Law in Support of its Motion and Certification of
Barry N. Saltzman in Support of the Motion upon:**

Flora Rainer, Esq.
Law Offices of Flora Rainer, Esq.
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Glendale, NY 11385
Attorney for Plaintiff
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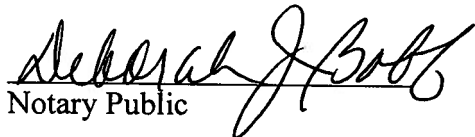
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by enclosing true copies of referenced documents, in a securely sealed and post-paid envelope
and causing it to be sent by regular first class mail to the recipients at the address set forth above.


Aseneth Wheeler-Russell

Sworn to before me this
11 day of March, 2011


Notary Public

DEBORAH J. BOBB
NOTARY PUBLIC, State of New York
No. 02BO4955367
Qualified in Queens County
Commission Expires Aug. 28, 2013